

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

IAN L. LAND,

Plaintiff,

Case No.: 22-cv-12672

Hon. Matthew F. Leitman

-vs-

CITY OF DETROIT, a municipal
corporation; RYAN RULOFF, individually
and in his official capacity; and MATTHEW
WEBB, individually and in his official
capacity

Defendants.

Ivan L. Land (P65879)
Law Offices of Ivan L. Land, P.C.
25900 Greenfield Rd., Ste. 210
Oak Park, MI 48237-1267
(248) 968-4545

Philip J. Hiltner (P77913)
City of Detroit Law Department
Attorney for Defendant City of Detroit
2 Woodward Ave., Ste. 500
Detroit, MI 48226
(313) 237-6390

PLAINTIFF'S RESPONSE TO DEFENDANTS' FIRST DISCOVERY REQUESTS

Plaintiff submits the following as a response to Defendant's First Discovery
Requests.

INTERROGATORIES

1. Please identify by name and address every employer you have had in the
past 10 years.

ANSWER:

Hakim, Toma & Yaldoo, P.C. - 8424 Twelve Mile Rd Suite 200, Warren, MI

*Goodfellas Officiating- 3033 Dominique Dr. Troy, MI
Law Offices of Ivan L. Land, P.C.-25900 Greenfield Rd., Ste. 210 Oak Park, MI*

2. Please identify by name and addresses your healthcare providers for the past 10 years.

ANSWER:

Unknown. Plaintiff has had one regular check-up in a ten-year span.

3. Please identify by name and addresses any mental health providers you have seen in the past 10 years.

ANSWER:

None.

4. Please provide your username for every social media account you personally use or have ever used.

ANSWER:

*Instagram: the_ill_gentleman
Facebook: Ian Land*

5. Have you ever been convicted of any felonies or weapons offenses? Or have you been convicted of any crime that contained an element of dishonesty or false statement or a crime that contained an element of theft? If so, please state the crime with which you were charged, the crime of which you were convicted, the court in which you were convicted, and the date or approximate date of your conviction.

ANSWER:

Plaintiff has not been convicted of any felonies. Plaintiff was convicted of obtaining a pistol without a license.

6. Please provide the address and telephone number of Jyzelle Deese.

ANSWER:

Address:

Telephone:

REQUESTS FOR PRODUCTION OF DOCUMENTS

1. Please produce all photographs, audio recordings, and video depicting you on April 15, 2021, including the surveillance footage from the gas station mentioned in your initial disclosures.

ANSWER:

This information has been provided.

2. Please produce your state and federal income tax records from the past seven years.

ANSWER:

Plaintiff has not filed taxes in the past seven years.

3. Please produce records demonstrating your income for the three years before April 15, 2021.

ANSWER:

Plaintiff will provide at a later date.

4. Please produce a copy of your health insurance card.

ANSWER:

See Attached.

5. Please produce any social media posts created and/or posted by you or that you are otherwise aware of related to the events of April 15, 2021.

ANSWER:

None.

6. Please produce a bill of sale for the firearm seized by Defendants on April 15, 2021.

ANSWER:

See attached registration.

7. Please produce a license for the firearm seized by Defendants on April 15, 2021.

ANSWER:

See attached registration.

REQUEST FOR ADMISSION

1. Admit you did not have a concealed pistol license on April 15, 2021.

ANSWER:

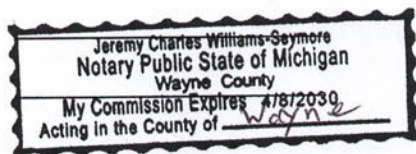
Admit that Plaintiff did not have a CPL, by way of further answer, there was no

reason for Plaintiff to need a CPL because Plaintiff never concealed a firearm.

STATE OF MICHIGAN)
COUNTY OF Wayne) SS.

The foregoing instrument was acknowledged before me on Feb 21st, 2024 by **Ian L. Land** known to me to be the person(s) described in and who executed the instrument.

My commission expires:



Ian L. Land

Notary Public

Wayne County,
Michigan